1		The Honorable David G. Estudillo
2		
3		
4		
5		
6		
7		DISTRICT COURT T OF WASHINGTON
8		ATTLE
9	GABRIELLA SULLIVAN, et al.,	NO. 3:22-cv-05403-DGE
10	Plaintiffs,	DECLARATION OF ANDREW HUGHES
11	v.	
12	BOB FERGUSON, in his official capacity as Washington State Attorney General, et al.,	
13	Defendants,	
14	ALLIANCE FOR GUN RESPONSIBILITY,	
15	Intervenor-Defendant.	
16		-
17	I, Andrew Hughes, declare as follows:	
18	1. I am over the age of 18, compet	ent to testify as to the matters herein, and make
19	this declaration based on my personal knowledg	ge.
20	2. I am an Assistant Attorney Gene	ral representing Attorney General Bob Ferguson
21	and John Batiste, Chief of the Washington State	e Patrol, in this matter.
22	3. Attached as Exhibit 1 is a true ar	nd correct copy of the transcript of the August 3,
23	2023, Deposition of James Curcuruto in Wiese	e v. Bonta, No. 2:17-cv-00903-WBS-KJN (E.D.
24	Cal.).	
25	//	
26	//	
I	I	

1

1	I declare under penalty of perjury under the laws of the State of Washington and the
2	United States that the foregoing is true and correct.
3	DATED this 1st day of September 2023 at Seattle, Washington.
4	//
5	/s/ Andrew Hughes ANDREW HUGHES, WSBA #49515 Assistant Attorney General
6	Assistant Attorney General
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	

1	<u>DECLARATION OF SERVICE</u>
2	I hereby declare that on this day I caused the foregoing document to be electronically
3	filed with the Clerk of the Court using the Court's CM/ECF System which will send notification
4	of such filing to all counsel of record.
5	I declare under penalty of perjury under the laws of the State of Washington and the
6	United States of America that the foregoing is true and correct.
7	DATED this 1st day of September 2023, at Seattle, Washington.
8	/a/ Androw Hughas
9	/s/ Andrew Hughes ANDREW HUGHES, WSBA #49515 Assistant Attorney General
10	Assistant Attorney General
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	